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PATENT APPLICATION

ATTORNEY DOCKET NO. 10992667-1IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Edward P. Maher et al.

Confirmation No.: 2250

Application No.: 09/702,380

Examiner: Mark E. Wallerson

Filing Date: Oct. 31, 2000

Group Art Unit: 2626

Title: Method And System Of Printing Identification Card (ID) Using An Inkjet Printer

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450TRANSMITTAL OF APPEAL BRIEFTransmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on Feb. 21, 2006.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) \$500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

☐ (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:☐ 1st Month
\$120☐ 2nd Month
\$450☐ 3rd Month
\$1020☐ 4th Month
\$1590☐ The extension fee has already been filed in this application.☒ (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.Please charge to Deposit Account 08-2025 the sum of \$ 500. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.☐ I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to:
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Respectfully submitted,

Edward P. Maher et al.

By 

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Attorney Docket No: 10992667-1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of: Maher et al.

Confirmation No.: 2250

Serial No.: 09/702,380

Group Art Unit: 2626

Filed: Oct. 31, 2000

Examiner: M. Wallerson

For: METHOD AND SYSTEM OF PRINTING IDENTIFICATION
CARD (ID) USING AN INKJET PRINTERAPPELLANTS'/APPLICANTS' OPENING BRIEF ON APPEAL

1. REAL PARTY IN INTEREST.

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holding, LLC.

2. RELATED APPEALS AND INTERFERENCES.

There are no other appeals or interferences known to Appellants, Appellants' legal representative or the Assignee which will affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

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3. STATUS OF CLAIMS.

Claims 1-19 are pending. The rejection of all pending claims is appealed.

4. STATUS OF AMENDMENTS.

No amendments were filed after the final action.

5. SUMMARY OF CLAIMED SUBJECT MATTER.

The claims relate to making identification cards by inkjet printing an image backward (reversed/mirror image) on a transparent media. The transparent media can then be laminated printed side down on a plastic card so that the image appears forward (not reversed/normal) when one looks at the card.

Claim 1, for example, is directed to an inkjet printing device (e.g., printer 130 in Fig. 1) that includes a processor configured to translate and transpose input images defining an identification card into reverse images (e.g., Specification page 4, line 33 through page 5, line 2 and reverse image 210 in Fig. 2), and an inkjet printhead configured to print the reverse images on a transparent media (e.g., Specification page 4, lines 23-26).

Claim 11, for example, is directed to a method that includes creating a digital file having images and text (e.g., Specification page 4, lines 8-18), translating and transposing the images and text to define reversed data (e.g., Specification page 4, line 33 through page 5, line 2 and reverse image 210 and INFO 215, 220 and 225 in Fig. 2), and printing the reversed data on a transparent media with an inkjet printhead (e.g., Specification page 5, lines 5-12).

6. GROUNDS OF REJECTION TO BE REVIEWED.

1. Oshikoshi does not teach printing a reverse image. Ground No. 1 applies to the Section 103 rejection of all claims.

2. The Examiner has failed to make any showing whatsoever that the cited references teach or suggest laminating the printed transparent material to a plastic card with the printed side of the transparent material adhering to the card. Ground No. 2 applies to the Section 103 rejection of Claims 4 and 14.

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7. ARGUMENT.**GROUND NO. 1****Oshikoshi does not teach printing a reverse image.
(Claims 1-19)**

Claims 1-19 were rejected under Section 103 as being obvious over Oshikoshi (4,769,694) in view of Waller (6,692,799) (Claims 1, 6 and 11) and further in view of Akada (6,392,680) (Claims 2-5, 7-10 and 12-20). The rejections are all based on the assertion that Oshikoshi teaches printing a reverse image. This assertion is not correct.

To establish a prima facie case of obviousness the prior art references must teach or suggest all claim limitations. MPEP § 2143. In Oshikoshi, the images are stored as negatives (column 2, lines 66-67 and column 3, lines 7-9) and "printed" as positives by exposing photographic color printing paper to red, green and blue light (Figs. 9 and 10 and column 7, lines 23-55). While the text in Oshikoshi at column 7 is confusing, it is clear from Figs. 9 and 10 that the images are printed in their normal/positive orientation. See also, Oshikoshi column 3, lines 40-46.

In response, the Examiner states that "Oshikoshi discloses printing reversed images (column 2, line 67 to column 3, line 9)...." The cited passage in Oshikoshi is quoted in full below.

"That literal image is reversed as a negative and stored on a recording medium, for example a floppy disk. Because the floppy disk storing the personal data can reproduce the literal images at any time, the use of a floppy disk makes it easy to provide renewal cards.

A design image input section 14, which is, for example, a digitizer, is used to input graphics, such as a company mark. That design image is reversed as a negative and stored on a floppy disk."

There is nothing in this passage that says anything about printing the image in general, and more specifically printing the image as a negative/reversed image. Appellants acknowledge that Oshikoshi teaches storing the image as a negative/reversed image. As detailed above, however, the images in Oshikoshi are printed as positive/normal images. The Examiner has failed to show that Oshikoshi teaches or even suggests printing a reverse image as claimed. In fact, it does not.

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The Examiner, therefore, has not established a prima facie case of obviousness based on Oshikoshi and the rejections should be reversed.

GROUND NO. 2

The Examiner has failed to make any showing whatsoever that the cited references teach or suggest laminating the printed transparent material to a plastic card with the printed side of the transparent material adhering to the card. (Claims 4 and 14)

Claim 4 recites that each printed portion of the transparent media is laminated to a plastic card with the side of the transparent media containing the images being adhered to the card. Claim 14 recites similar limitations. The Examiner has failed to make any showing whatsoever that the cited references teach or suggest laminating the printed transparent material to a plastic card *with the printed side of the transparent material adhering to the card*. The Examiner's remarks regarding Claims 4 and 14 at page 4 of the final Office Action do not address the italicized limitation. In fact, so far as Appellants can tell, the combination of Oshikoshi, Waller and Akada does not teach or suggest laminating the printed reverse image side of the media to the plastic card.

The Examiner has failed to carry his burden of establishing a prima facie case of obviousness as to Claims 4 and 14 and the rejection of those claims, therefore, should be reversed.

Respectfully submitted,

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APPENDIX I – CLAIMS INVOLVED IN THE APPEAL

1. An inkjet printing device for printing identification cards, comprising:
an input area for holding transparent media;
a processor configured to receive input images that define the
identification card and to translate and transpose the input images into reverse images;
and
an inkjet printhead coupled to the processor and configured to receive and
print the reverse images on portions of the transparent media.
2. The inkjet printing device of claim 1, wherein the transparent media is a roll
of polyester media.
3. The inkjet printing device of claim 2, wherein the transparent media is
coated with a material to absorb and control the amount of ink spread to allow the
dispensed ink to remain on the transparent media.
4. The inkjet printing device of claim 3, wherein each printed portion of the
transparent media is laminated to a plastic card, the side of the transparent media
containing the images being adhered to the card.
5. The inkjet printing device of claim 4, wherein an adhesive tape is used to
lamine the transparent media to the card.
6. The inkjet printing device of claim 5, wherein the images include a
photographic image as well as alphanumerical data of an individual.
7. The inkjet printing device of claim 6, wherein the laminated plastic card is
automatically cut by the printing device as an identification card.

8. The inkjet printing device of claim 7, further comprising a hot air dryer to dry the images on the transparent media before the transparent media is laminated to the plastic card.

9. The inkjet printing device of claim 8, wherein the transparent media is automatically laminated to the plastic card.

10. The inkjet printing device of claim 9, further comprising a die cut to automatically cut the laminated plastic card into the identification card.

11. A method of producing an identification card using a processor of a host computer coupled to an inkjet printhead of an inkjet printing device comprising:
creating a digital file on the host computer having images and text;
translating and transposing, with the processor, the images and the text to define reversed data;
sending the reversed data to an inkjet printhead to be printed by the inkjet printing device that includes an input area for holding transparent media; and
printing the reversed data on a portion of the transparent media with the inkjet printhead.

12. The method of claim 11, wherein the transparent media is a roll of polyester media.

13. The method of claim 12, wherein the polyester roll is coated with a material to absorb and control the amount of ink spread to allow the dispensed ink to remain on the portion of the polyester media.

14. The method of claim 13, wherein each polyester roll is laminated to a plastic card, the side of the polyester media containing the images being adhered to the card.

15. The method of claim 14, wherein an adhesive tape is used to laminate the polyester media to the card.

16. The method of claim 15, wherein the laminated plastic card is cut into an identification card.

17. The method of claim 16, further comprising a hot air dryer to dry the images on the polyester media before the polyester media is laminated to the plastic card.

18. The method of claim 17, wherein the polyester media is automatically laminated to the plastic card.

19. The method of claim 18, wherein the inkjet printing device further comprises a die cut to automatically cut the laminated plastic card into the indemnification card.

APPENDIX II -- EVIDENCE SUBMITTED UNDER RULES 130, 131 OR 132

none

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APPENDIX III – RELATED PROCEEDINGS

none